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OCT - 4 1985

Remedy Delegation to Region IV for the
Lee's Lane Landfill Site, Kentucky

Regional Administrator, Region IV

Winston Porter, Assistant Administrator WH-562A
Office of Solid Waste and Emergency Response

I am requesting the authority to select the remedy for the Lee's Lane Landfill Site in Louisville, Kentucky. I have attached the Delegation Analysis Summary and the Remedial Investigation/Feasibility Study Reports. These documents will aid in providing a better understanding of the issues and concerns regarding the site.

If you have any questions, please contact me.

/s/ Sanford W. Harvey, Jr.
Acting

Jack E. Ravan

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Delegation Analysis Summary
Lees Lane Landfill
Louisville, KY
Federal Lead

I. Delegation Criteria

Remedial action in which the off-site contamination is limited.

II-VI. The RI/FS Reports are enclosed.

VII. Remaining Alternatives Description

See the attached summary of remedial action alternatives.

VIII. Recommended Alternatives

The recommended alternative has not been determined by the agency. This decision will be made after considering comments received from the public meeting. Regardless, the third alternative would seem to be the most cost-effective remedy which would provide protection of the public health, welfare and environment. This alternative includes surface waste area cleanup, bank protection controls, gas collection and venting system, optional alternate water supply and monitoring.

IX. The third alternative does not generally comply with other environmental standards. Based on the results of the RI Study, the contamination levels at the site are low and there is no evidence of an off-site public health or environmental problem related to the site at this time.

Monitoring of the groundwater and ambient air would be used to establish baseline conditions and to serve as an early detection system should site conditions change. Additional monitoring to determine alternative concentration limits would also be implemented. A bank protection program would be instituted to minimize erosion and failure of the landfill buffer zone along the Ohio River. Also, several exposed surface waste areas will be covered or removed.

On the basis of the conclusions drawn from the public health assessment, it does not seem feasible to implement remedies which would comply with other environmental laws at this time.

X. Approximately five-hundred (500) potentially responsible parties (PRPs) have been identified primarily on the basis of dump tickets from the Lees Lane Landfill. Notice letters were issued to approximately one-hundred and thirty (130) PRPs who resided or did business in the five county area near the landfill subsequent to EPA's implementation of the RI/FS. EPA has received responses from most of these 130 PRPs either acknowledging or denying their use of Lees Lane. Some PRPs gave vague or evasive responses.

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A thorough investigation is presently underway to determine whether the evidence (PRPs' responses and records available to EPA) is sufficient to support issuance of a second notice letter to each of the 130 PRPs. If it appears that more evidence is necessary, EPA will issue a preliminary second notice advising the PRP that the RI/FS is almost complete, and combine that with a 104 (e) information request letter. EPA also is investigating which, if any, of the "potential" PRPs located beyond the five county area should be sent a notice letter and/or information request letter.

The investigation should be completed during the first part of October, 1985.

XI. Community Relations

In March 1975 public concern was heightened when methane gas was found to be leaking into homes near the landfill.

In February 1980 public interest was again aroused when 400 exposed drums were discovered on the river bank adjacent to the landfill. In October 1980 the methane gas problem was alleviated by a gas venting system. As the methane gas dissipated so did citizen interest. Currently, the overall concern is low. Since 1980 there have been a few complaints of odors in the Riverside Gardens area. As a follow-up, we are presently investigating the methane gas situation so as to determine whether a problem still exists.

II. Issues To Be Resolved

Alternate Water Supply is still under consideration.

II. Schedule

Public Meeting is scheduled for October 15, 1985. The final RI/FS Reports should be available in late November 1985.

IV. Future Actions

The planned course of action will address current site problems. In addition, long term monitoring is included as a part of each alternative.

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